

1 Bradley S. Slighting, Esq.
2 Nevada Bar No. 10225
3 SLIGHTING LAW
4 1707 Village Center Cir, Ste 100
5 Las Vegas, NV 89134
6 Tel: (702) 232-2543
7 brad@slightinglaw.com

8 Justin L. James, Esq.
9 *Pro Hac Vice*
10 Utah Bar No. 15167
11 JAMES DODGE RUSSELL & STEPHENS PC
12 10 W. Broadway, Suite 400
13 Salt Lake City, UT 84101
14 Tel: (801) 363-6363
15 jjames@jdrslaw.com

16 *Attorneys for Defendant/Counterclaimant*
17 *Ivan Tapia and Defendants Angela Cruikshank,*
18 *Jeff Cruikshank, and Justin Owens*

19 **UNITED STATES DISTRICT COURT**
20 **DISTRICT OF NEVADA**

21 INTERNATIONAL MARKETS LIVE INC.,
22 a New York corporation dba IM MASTERY
23 ACADEMY,

24 Plaintiff,

25 v.

26 DAVID IMONITIE an individual; SPELA
27 SLUGA, an individual; DEVON ROESER,
28 an individual; IVAN TAPIA, an individual;
NVISIONU, INC., a Delaware corporation;
ILYKIT, LLC, a Utah limited liability
company, LUCAS LONGMIRE, an
individual; NATHAN SAMUEL, an
individual; MICHAEL ZHOR, an individual;
IMRAN RICHIE, an individual; JUSTIN
OWENS, an individual; PAULO
CAVALLERI, an individual; JOSE
MIGUEL CONTREAS, an individual; BASS
GRANT, an individual; ANGELA
CRUIKSHANK, an individual; JEFF
CRUIKSHANK, an individual; VINCE
MURPHY, an individual; GARY
MCSWEEN, an individual; KATRINA

Case No.: 2:22-CV-01863-GMN-BNW

**STIPULATION AND [PROPOSED]
ORDER RE: EXTENSION OF TIME FOR
FILING OF DEFENDANTS' REPLIES TO
PLAINTIFF'S RESPONSES TO
DEFENDANTS' MOTIONS TO DISMISS
(ECF NOS. 168 AND 169) (FIRST
REQUEST)**

1 WORGESS, an individual; LUIS
 2 RONALDO HARNANDEZ ARRIAGA, an
 3 individual; STEPHANIA AYO, an
 4 individual; SILVIA AYO, an individual;
 5 CATALINA VASQUEZ, an individual;
 6 MATHIAS VASQUEZ, an individual;
 7 DOES 1 through 10, inclusive; and ROE
 8 CORPORATIONS I through X, inclusive,
 9
 10 Defendants.

11 AND ALL RELATED MATTERS

12 **STIPULATION AND [PROPOSED] ORDER**

13 Defendants Angela Cruikshank, Jeff Cruikshank, and Justin Owens (“Defendants”), and
 14 Plaintiff International Markets Live, Inc. dba IM Mastery Academy (“Plaintiff”), (collectively, the
 15 “Parties”) by and through their respective undersigned counsel of record, the law firms of Slighting
 16 Law, James Dodge Russell & Stephens PC, Kerr Simpson Attorneys at Law, and Holland & Hart
 17 LLP, hereby stipulate and agree to extend the deadline for Defendants to file their Replies to
 18 Plaintiff’s Responses to Defendants’ Motions to Dismiss (ECF. Nos. 168 and 169; filed 5/12/23).
 19 This is the first stipulation between the Parties to extend the time for Defendants to reply to
 20 Plaintiff’s Responses to Defendants’ Motions to Dismiss. The Parties hereby specifically agree and
 21 stipulate as follows:

22
 23 WHEREAS, on May 1, 2023, Defendants Angela Cruikshank and Jeff Cruikshank filed
 24 their Motion to Dismiss Plaintiff’s First Amended Complaint (ECF No. 47) Pursuant to FRCP
 25 12(b)(2) for Lack of Personal Jurisdiction (ECF No. 156).

26 WHEREAS, on May 1, 2023, Defendant Justin Owens filed his Motion to Dismiss
 27 Plaintiff’s First Amended Complaint (ECF No. 47) Pursuant to FRCP 12(b)(2) for Lack of Personal
 28 Jurisdiction (ECF No. 157).

1 WHEREAS, on May 12, 2023, Plaintiff filed its Responses to Defendants' Motions to
2 Dismiss (ECF Nos. 168 and 169).

3 WHEREAS, on May 18, 2023, counsel for the Parties met and conferred via telephone and
4 agreed to allow Defendants an additional one (1) week of time from the current due date of May
5 19, 2023 to file their Replies to Plaintiff's Responses to Defendants' Motions to Dismiss, thereby
6 making such Replies due May 26, 2023.
7

8 WHEREAS, no parties oppose the extension of time for the filing of Defendants' Replies to
9 Plaintiff's Responses to Defendants' Motions to Dismiss as set forth herein.

10 ///

11 ///

12 ///

13 ///

14 ///

15 ///

16 ///

17 ///

18 ///

19 ///

20 ///

21 ///

22 ///

23 ///

24 ///

25 ///

26 ///

27 ///

28 ///

THEREFORE, the Parties jointly stipulate that the Court should enter an order allowing Defendants to file their Replies to Plaintiff's Responses to Defendants' Motions to Dismiss by May 26, 2023.

Respectfully submitted, this 19th day of May 2023

SLIGHTING LAW

/s/Bradley S. Slighting
Bradley S. Slighting, Esq.
 Nevada Bar No. 10225
 1707 Village Center Cir, Ste 100
 Las Vegas, NV 89134

WELLMAN AND WARREN LLP

/s/ Chris Wellman
Chris Wellman, Esq. (Pro Hac Vice)
 California Bar No. 304700
 24411 Ridge Route Dr., Unit 200
 Laguna Hills, CA 92653

JAMES DODGE RUSSELL & STEPHENS PC

/s/ Justin L. James
Justin L. James, Esq. (Pro Hac Vice)
 Utah Bar No. 15167
 10 West Broadway, Suite 400
 Salt Lake City, Utah 84101

*Attorneys for Defendant/Counterclaimant
 Defendant David Imonitie and Defendants
 Spela Shuga, Devon Roeser, NVisionU, Inc.
 Bass Grant, Lucas Longmire, and
 Vince Murphy*

*Attorneys for Defendant/Counterclaimant
 Ivan Tapia and Defendants Angela Cruikshank,
 Jeff Cruikshank, and Justin Owens*

HOLLAND & HART LLP

/s/ Jenapher Lin
 Lars K. Evensen, Esq.
 Nevada Bar No. 8061
Jenapher Lin, Esq.
 Nevada Bar No. 14233
 9555 Hillwood Drive, 2nd Floor
 Las Vegas, NV 89134

THOMPSON BURTON, PLLC

/s/ Jon E. Field
Jon E. Field, Esq.
 Nevada Bar No. 7700
 One Franklin Park
 6100 Tower Circle Suite 200
 Franklin, TN 37067

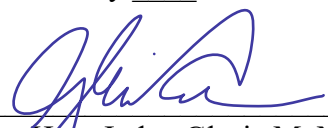
Attorneys for Defendant ILYKIT, LLC

P. Sterling Kerr, Esq.
 Nevada Bar No. 3978
 George E. Robinson, Esq.
 Nevada Bar No. 9667
KERR SIMPSON ATTORNEYS AT LAW
 2900 W. Horizon Ridge Parkway, Suite 200
 Henderson, NV 89052

IT IS SO ORDERED.

Dated: May 22, 2023.

*Attorneys for Plaintiff/Counterdefendant
 International Markets Live, Inc. and
 Counterdefendant Christopher Terry*


 The Hon. Judge Gloria M. Navarro
 UNITED STATES DISTRICT JUDGE

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 19th day of May, 2023, a true and correct copy of the foregoing **STIPULATION AND [PROPOSED] ORDER RE: EXTENSION OF TIME FOR FILING OF DEFENDANTS' REPLIES TO PLAINTIFF'S RESPONSES TO DEFENDANTS' MOTIONS TO DISMISS (ECF NOS. 168 AND 169) (FIRST REQUEST)** was filed with the Clerk of the Court using the CM/ECF system which automatically sent notification of such filing to and served electronically upon the following counsel:

E-SERVICE LIST

Jon E. Field, Esq.
THOMPSON BURTON, PLLC
One Franklin Park
6100 Tower Circle Suite 200
Franklin, Tennessee 37067
Tel: (615) 465-6000
Email: jfield@thompsonburton.com
Attorney for Defendant ILYKIT, LLC

P. Sterling Kerr, Esq.
Nevada Bar No. 3978
George E. Robinson, Esq.
Nevada Bar No. 9667
KERR SIMPSON ATTORNEYS AT LAW
2900 W. Horizon Ridge Parkway, Suite 200
Henderson, NV 89052
Tel: (702) 451.2055
sterling@kerrsimpsonlaw.com
george@kerrsimpsonlaw.com

Bradley S. Slighting, Esq.
Nevada Bar No. 10225
SLIGHTING LAW
1707 Village Center Cir., Ste 100
Las Vegas, NV 89134
Tel: (702) 840-3749
Email: brad@slightinglaw.com

Lars K. Evensen, Esq.
Nevada Bar No. 8061
Jenapher Lin, Esq.
Nevada Bar No. 14233
HOLLAND & HART LLP
9555 Hillwood Drive, 2nd Floor
Las Vegas, NV 89134
Phone: (702) 669.4600
lkevensen@hollandhart.com
jlin@hollandhart.com

Chris Wellman, Esq.
Pro Hac Vice
California Bar No. 304700
WELLMAN AND WARREN LLP
24411 Ridge Route Dr., Unit 200
Laguna Hills, CA 92653
Email: cwellman@w-wlaw.com

*Attorneys for Plaintiff/Counterdefendant
International Markets Live, Inc. and
Counterdefendant Christopher Terry*

*Attorneys for Defendant/Counterclaimant
David Imonitie and Defendants Spela Sluga,
Devon Roeser, NVisionU, Inc., Bass Grant,
Lucas Longmire, and Vince Murphy*

/s/ Bradley S. Slighting
An employee of Slighting Law